

Integrated Accessibility Standards Policy

Accessibility for Ontarians with Disability Act, 2005



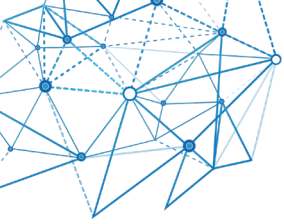
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1. Purpose

The following policy has been established by Surgical Safety Technologies (SST) to govern the provision of its services in accordance with Regulation 191/11, “Integrated Accessibility Standards” (“Regulation”) under the Accessibility for Ontarians with Disabilities Act, 2005. These standards are developed to break down barriers and increase accessibility for people with disabilities in the areas of information and communications, employment and transportation. SST is governed by this policy as well as the Accessibility for Ontarians with Disabilities Act, 2005 in meeting the accessibility needs of persons with disabilities and endeavors to regularly ensure and implement accessibility standards in all of its practices.

2. The SST Commitment

SST strives to ensure a fully accessible environment for all persons with disabilities, and will continue to build upon and improve its practices in addition to ensuring that it meets the accessibility needs of persons with disabilities in a timely manner, consistent with the specific requirements of the Act and its regulations. This policy will be implemented in accordance with the time frames established by the Regulation.

3. Accessibility Plan

SST will develop, maintain and document an Accessibility Plan outlining the organization’s strategy to prevent and remove barriers from its workplace and to meet its requirements under the Regulation. The Accessibility Plan will be reviewed and updated in consultation with persons with disabilities at least once every five years. Upon request, SST will provide a copy of the Accessibility Plan in an accessible format. Status reports on the progress of measures taken to implement the organization’s strategy outlined in its Accessibility Plan, will be made available in an accessible format upon request.

4. Procuring or Acquiring Goods, Services or Facilities

SST will continue to ensure that accessibility criteria and features are incorporated when it procures or acquires goods, services or facilities, except where it is not practicable to do so. Where it is impracticable to incorporate accessibility criteria and features, SST will provide an explanation upon request.



5. Training Employees and Volunteers

SST will ensure that training is provided on the requirements of the accessibility standards referred to in the Regulation and continue to provide training on the Human Rights Code as it pertains to persons with disabilities, to:

- all its employees, consultants and volunteers;
- all other persons who provide goods, services or facilities on behalf of SST

The training will be appropriate to the duties of the employees, volunteers and other persons. Staff will be trained when changes are made to the accessibility policy. New staff will be trained upon commencement of employment. SST will keep a record of the training it provides.

6. Information and Communications Standards

6.1 Feedback

SST will strive to ensure that its process for receiving and responding to feedback is accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communications supports, upon request.

6.2 Accessible Formats and Communication Supports

Upon request, SST will provide, or will arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner that considers the person's accessibility needs due to disability.

SST will consult with the person making the request in determining the suitability of an accessible format or communication support.

SST will also notify the public about the availability of accessible formats and communication supports.

6.3 Accessible Websites and Web Content

SST will make reasonable effort to ensure that its Internet and Intranet websites, including web content, conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level AA except where this is impracticable.



7. Employment Standards

7.1 Recruitment

SST will notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process.

7.2 Recruitment, Assessment or Selection Process

SST will notify job applicants, when they are individually selected to participate further in an assessment or selection process, that accommodations are available upon request in relation to the materials or processes to be used. If a selected applicant requests an accommodation, SST will consult with the applicant and provide, or arrange for the provision of a suitable accommodation in a manner that considers the applicant's accessibility needs due to disability.

7.3 Notice to Successful Applicants

When making offers of employment, SST will notify the successful applicant of its policies for accommodating employees with disabilities.

7.4 Informing Employees of Supports


SST will continue to inform its employees of its policies (and any updates to those policies) used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. This information will be provided to new employees as soon as practicable after commencing employment.

7.5 Accessible Formats and Communication Supports for Employees

Upon the request of an employee with a disability, SST will consult with the employee to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform his/her job, and information that is generally available to other employees. In determining the suitability of an accessible format or communication support, the SST will consult with the employee making the request.

7.6 Workplace Emergency Response Information

SST will provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized



information is necessary, and if SST is aware of the need for accommodation due to the employee's disability. SST will provide this information as soon as practicable after becoming aware of the need for accommodation.

Where the employee requires assistance, SST will, with the consent of the employee, provide the workplace emergency response information to the person designated by SST to provide assistance to the employee.

7.7 Documented Individual Accommodation Plans

SST will continue to maintain a written process for the development of documented individual accommodation plans for employees with disabilities.

If requested, information regarding accessible formats and communications supports provided will also be included in individual accommodation plans.

In addition, the plans will include individualized workplace emergency response information (where required) and will identify any other accommodation that is to be provided.

7.8 Return to Work Process

SST will maintain a documented return to work process for its employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work.

The return to work process will outline the steps SST will take to facilitate the return to work and will include documented individual accommodation plans as part of the process.

This return to work process will not replace or override any other return to work process created by or under any other statute (ie. the Workplace Safety Insurance Act, 1997).

7.9 Performance Management, Career Development and Advancement & Redeployment

SST will continue to take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement to employees, or when redeploying employees.



8. Definitions

Accessibility — The term accessibility means giving people of all abilities opportunities to participate fully in everyday life. It is used to describe how widely a service, product, device, or environment is available to as many people as possible. Accessibility can be seen as the ability to access and benefit from a system, service, product or environment.

Barrier — Barriers are obstacles that limit access and prevent people with disabilities from fully participating in society. Most barriers are not intentional. Barriers usually arise because the needs of people with disabilities are not considered from the beginning.

Disability — Ontario's accessibility law adopts the definition for disability that is in the Ontario Human Rights Code. It defines disability broadly:

- a) "any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device,
- b) a condition of mental impairment or a developmental disability,
- c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- d) a mental disorder, or
- e) an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997."